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*Attorneys for Defendant Wells Fargo Bank, N.A.,  
erroneously named as Wells Fargo Home Mortgage,  
Inc. and Wells Fargo Financial Nevada 2 Inc.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LAWRENCE SHADID and CLARICE  
SHADID,

Plaintiff,

v.

WELLS FARGO BANK, N.A.; WELLS  
FARGO HOME MORTGAGE, INC.,  
WELLS FARGO FINANCIAL NEVADA 2  
INC., and EQUIFAX INFORMATION  
SERVICES, LLC,

Defendants.

Case No.: 2:17-cv-02662-APG-CWH

**STIPULATION AND ORDER TO  
CONTINUE DISCOVERY**

**[SECOND REQUEST]**

Under Fed. R. Civ. P. 26(f), and Local Rule 26-4, Plaintiffs Lawrence and Clarice Shadid (“Plaintiffs”) and Defendant Wells Fargo Bank, N.A. (“Wells Fargo”), erroneously named as Wells Fargo Home Mortgage, Inc. and Wells Fargo Financial Nevada 2 Inc., through their attorneys, stipulate to extend certain deadlines in the June 13, 2018 Scheduling Order. Plaintiffs and Wells Fargo are referred to as “the Parties.”

**1. Discovery Completed:**

Plaintiffs served their initial disclosures on February 23, 2018. Wells Fargo served its initial disclosures on February 21, 2018. On May 22, 2018, Plaintiffs served their First Set of Requests for Production of Documents and Interrogatories to Wells Fargo.

**2. Discovery to be Completed:**

Plaintiffs intend to depose Wells Fargo’s Rule 30(b)(6) witness, and Wells Fargo intends

1 to depose Plaintiffs. Wells Fargo also intends to serve Plaintiff with a set of requests for  
2 admission, interrogatories, and requests for production of documents.

3 **3. Reasons Why Discovery Not Completed Within Time Limits:**

4 Good cause supports this request to extend discovery as written discovery is well underway  
5 and the proposed extension will allow for sufficient time to conduct necessary, additional  
6 discovery, including depositions. The Parties are in settlement negotiations, and should they not  
7 settle, Plaintiffs request this extension for sufficient time to file a potential amended complaint. No  
8 prejudice will occur to this Court or the Parties if granted. Thus, this stipulation is supported by  
9 good cause.

10 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS  
11 HEREBY STIPULATED AND AGREED that the June 13, 2018 Scheduling Order shall be  
12 amended as follows:

- 13 • Discovery Cutoff: November 15, 2018
- 14 • Amending Pleadings/Adding Parties: August 15, 2018
- 15 • Initial Expert Disclosures/Interim Status Report: September 14, 2018
- 16 • Rebuttal Expert Disclosures: October 15, 2018
- 17 • Dispositive Motion deadline: December 14, 2018
- 18 • Joint Proposed Pretrial Order: January 15, 2019 or 30 days after decision on any  
19 dispositive motion.

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21 ///

22 ///

**IT IS SO STIPULATED.**

Dated: July 9, 2018.	Dated: July 9, 2018.
By: <u>/s/ Matthew Knepper</u> Matthew Knepper, Esq. Miles N. Clark, Esq. KNEPPER & CLARK LLC 10040 W. Cheyenne Ave. Suite #170-109 Las Vegas, NV 89129 Phone: 702.825.6060	By: <u>/s/ Karl O. Riley</u> Kelly H. Dove, Esq. Karl O. Riley, Esq. SNELL & WILMER L.L.P. 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, NV 89169
<i>Attorneys for Plaintiffs Lawrence and Clarice Shadid</i>	<i>Attorneys for Defendant Wells Fargo Bank, N.A., erroneously named as Wells Fargo Home Mortgage, Inc. and Wells Fargo Financial Nevada 2 Inc.</i>

**ORDER**

**IT IS ORDERED THAT** the June 13, 2018 Scheduling Order shall be amended as follows:

- Discovery Cutoff: November 15, 2018
- Amending Pleadings/Adding Parties: August 15, 2018
- Initial Expert Disclosures/Interim Status Report: September 14, 2018
- Rebuttal Expert Disclosures: October 15, 2018
- Dispositive Motion deadline: December 14, 2018
- Joint Proposed Pretrial Order: January 15, 2019 or 30 days after decision on any

dispositive motion.

**IT IS SO ORDERED.**

Dated: July 11, 2018.

  
UNITED STATES MAGISTRATE JUDGE